

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**RECEIVED**  
Aug 19, 2008 LCW  
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MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

Mr. Andrew Gross III #28240-039

Case No.

Plaintiff,

Honorable:

v.

TransUnion Corp.  
Acxiom Corporation  
Defendants, /

**08CV4704**  
**JUDGE DOW**  
**MAG. JUDGE COX**

SUMMONS AND COMPLAINT  
CIVIL COMPLAINT

Dear, Magistrate Judge , This is a class Action suit, On or about January 1, 1987 up until May 28, 2008 I had an open credit account or an open line of credit from a credit grantor such as department store credit cards and retail store credit cards and student loans. within the United States of America. TransUnion and Acxiom Corp. violated the Fair Credit Reporting Act (FCRA) When they sold lists containing my personal and financial consumer information to third parties for marketing purposes.

Dear Judge Robert W. Gettleman, I'm requesting a Trial by Jury! as a result of the damages from the defendants, I suffered stress and mental anguish, a violation of my liberty Interest, and I was left financially vulnerable, I seek statutory damages in the Amount of \$50,000.00 thousand dollars and punitive damages in the Amount of \$1,000,000.00 One million dollars because the defendant's actions were willful, and I seek reasonable Attorney's fees in the amount of \$3,750.00 Three Thousand Seven Hundred Fifty dollars.

This class action is Inregards to In re TransUnion Corp. Privacy Litigation, Case No. 00-CV-4729, MDL Docket No. 1350, In which I object to the settlement by August 22, 2008.

Respectfully Submitted

*Mr. Andrew Gross III*

Mr. Andrew Gross III #28240-039  
P.O. Box # 33  
Terre Haute, Indiana 47808-0033

CERTIFICATE OF SERVICE

I Mr. Andrew Gross III, hereby certify that I mailed a True copy of my class action Law suit, and Summons and Civil Complaint, To Judge Robert W. Gettleman and The Clerk of United States District Court, Northern District of Illinois, Eastern Division, To 1703 Everett McKinley Dirksen Building, 219 S. Dearborn St. Chicago, Il 60604. Dear District Court I ask that the District Court have the U.S. Marshall serve the Defendants a copy of this summons and complaint was placed in the Institutional Legal mailbox on This 13th day of August 2008.

To: TransUnion Corp:  
P.O. Box 2000  
Chester, PA 19022

Respectfully Submitted

To: United States District Court  
Northern District of Illinois  
Eastern Division  
1703 Everett Mckinley Dirksen Building,  
219 S. Dearborn St.  
Chicago, Ill 60604

Mr. Andrew Gross III  
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#28240-039  
P.O. Box # 33  
Terre Haute, Indiana 47808-0033

## LEGAL NOTICE

*In re Trans Union Corp. Privacy Litigation*, Case No. 00-CV-4729, MDL Docket No. 1350,  
U.S. Dist. Ct., N. Dist. Illinois, Eastern Division, Judge Robert W. Gettleman

## If you had a credit card, loan or credit account, you could get benefits from a class action settlement.

*Para una notificación en Español, llamar o visitar nuestro website.*

A settlement worth at least \$75 million has been reached with Trans Union LLC and Acxiom Corporation ("Defendants") in a class action lawsuit that claims the Defendants violated state laws and the Fair Credit Reporting Act ("FCRA") when they sold lists containing personal and financial consumer information to third parties for marketing purposes. The settlement does not mean the Defendants violated any laws or did anything wrong. The Defendants deny any claims of wrongdoing in this case.

The United States District Court for the Northern District of Illinois will have a hearing to decide whether to give final approval to the settlement, so that benefits can be issued. Those included in the class action, together called a "Class," may object to the settlement or ask to speak at the hearing. Eligible Class members may also sign up for credit monitoring or other benefits from the settlement. For more information, including a detailed notice, go to [www.ListClassAction.com](http://www.ListClassAction.com) or call, toll-free, 1-866-416-3470.

### WHO'S INCLUDED?

The Court decided that the Class includes all consumers who had an open credit account or an open line of credit from a credit grantor (including, for instance automobile loans, bank credit cards, department store credit cards, other retail store credit cards, finance company loans, mortgage loans, and student loans) located in the United States anytime from January 1, 1987 to May 28, 2008.

### WHAT DOES THE SETTLEMENT PROVIDE?

The settlement will: (1) establish a \$75 million Settlement Fund; (2) give Class members the option of selecting six or nine months of credit monitoring services; (3) donate \$150,000 to non-profit organizations; (4) pay for settlements or judgments for damage claims related to lawsuits brought individually by Class members against the Defendants; (5) pay class counsels' attorneys' fees and their expenses; (6) pay the costs of notice and administering the settlement; and (7) distribute any money remaining (after deducting the costs for everything listed above) in the Settlement Fund to Class members who register for a payment or to non-profit organizations.

The six months of credit monitoring services (which retails for \$59.75) include: (1) the ability to lock your credit report so third parties, such as lenders or other companies, will not be able to access your credit report without your consent (unless allowed by law); (2) unlimited daily access to your Trans Union credit report and credit score; and (3) credit monitoring with a 24-hour email credit notification service. The nine months of enhanced credit monitoring services (which retails for \$115.50) includes all the services listed above, plus a suite of insurance scores and a mortgage simulator service. If you get the enhanced credit monitoring you will not be able to get a payment from the settlement or start an individual lawsuit. More details on all of the settlement benefits are available in the Settlement Agreement

which can be obtained at [www.ListClassAction.com](http://www.ListClassAction.com) or by calling, toll-free, 1-866-416-3470.

### HOW DO YOU ASK FOR BENEFITS?

To receive credit monitoring from the settlement you must go to [www.ListClassAction.com](http://www.ListClassAction.com) and register by **September 24, 2008**. If you register, you will have six months after the Court grants final approval to the settlement and all appeals are resolved to activate your credit monitoring benefit. You may also register at the website or by mail until **September 24, 2008**, to receive a possible cash payment.

### YOUR OTHER RIGHTS.

Whether or not you seek any benefits being offered as part of this settlement, all Class members will not be able to participate in a class action or join multiple plaintiffs in a single action. You may object to the settlement by **August 22, 2008**. The detailed notice explains how to object. Your options for benefits provided by the settlement are as follow:

- **File an individual lawsuit against Defendant(s) for claims related to target marketing and prescreening:** You can also sign up for six months of credit monitoring.
- **Sign up for six months of credit monitoring services:** You can also register to receive a possible cash payment in the event of a cash distribution or file an individual lawsuit against the Defendants.
- **Sign up for nine months of enhanced credit monitoring services:** You will not receive any further benefits, including a cash payment, and you will not be able to file an individual lawsuit against the Defendants.
- **Register to receive a possible cash payment:** You can also sign up for six months of credit monitoring; however if you receive a cash payment, you cannot file an individual lawsuit against the Defendants.
- **Do Nothing:** You won't get any benefits. You will keep your right to sue the Defendants individually (see the detailed notice and Settlement Agreement for more information).

The Court will hold a hearing in this case on **September 10, 2008**, at Courtroom 1703, Everett McKinley Dirksen Building, 219 S. Dearborn St., Chicago, IL 60604, to consider whether to approve the settlement, and set a date to consider a request by Class Counsel for attorneys' fees of up to 25% of the Settlement Fund, and reimbursement of costs and expenses. Class Counsel will also request a payment of up to \$3,750 for each of the Class Representatives who helped the lawyers on behalf of the whole Class. Class members may ask to appear and speak at the hearing at their own cost, but they don't have to. For more information, call, toll-free, 1-866-416-3470 or go to the website shown below.

**[www.ListClassAction.com](http://www.ListClassAction.com)**

**1-866-416-3470**